Department of Energy

Richland Operations Office

CORRESPONDENCE

CONTROL

memorandum

DATE: 1993

REPLY TO

ATTH OF: ERD:BLF/93-ERB-140

SUBJECT:

NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) CATEGORICAL EXCLUSION (CX) DETERMINATION: EXPEDITED RESPONSE ACTION (ERA) FOR THE N-SPRINGS, 100-N AREA, HANFORD SITE, RICHLAND, WASHINGTON

To: Carol M. Borgstrom, Director
Office of NEPA Oversight, EH-25, HQ

Using authority delegated to me by the Assistant Secretary for Environmental Restoration and Waste Management (EM-1), I have determined that the subject proposed action fits within a typical class of action currently available for CX in Subpart D of the U.S. Department of Energy (DOE) NEPA Implementing Procedures, 10 CFR 1021, and satisfies all eligibility criteria.

The enclosed CX and its supporting Information Bulletin are provided for your review as required by DOE Order 5440.1E. Questions may be directed to Bryan L. Foley of the Environmental Restoration Division on (509) 376-7087, or the DOE Richland Operations Office NEPA Compliance Officer, Paul F. X. Dunigan, Jr., on (509) 376-6667.

John D. Wagoner Manager

Enclosures:

1. CX Determination

Information Bulletin

cc w/encls:

L. Childers, USFWS

L. E. Harris, EM-431 (2 copies)

R. S. Scott, EM-20

K. A. Sycamore, NPS

R. P. Whitfield, EM-40

cc w/o encls:

R. H. Engelmann, WHC

M. H. Killinger, PNL



9513322.0135

FJUL 0 5 1993

ERD:BLF/93-ERB-140

NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) CATEGORICAL EXCLUSION (CX) TERMINATION: EXPEDITED RESPONSE ACTION (ERA) FOR THE N-SPRINGS, 100-N AREA, HANFORD SITE, RICHLAND, WASHINGTON

Carol M. Borgstrom, Director Office of NEPA Oversight, EH-25, HQ

Using authority delegated to me by the Assistant Secretary for Environmental Restoration and Waste Management (EM-1), I have determined that the subject proposed action fits within a typical class of action currently available for CX in Subpart D of the U.S. Department of Energy (DOE) NEPA Implementing Procedures, 10 CFR 1021, and satisfies all eligibility criteria.

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> ORIGINAL SIGNED BY J. P. HAMRIC DEPUTY MANAGER John D. Wagoner Manager

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K. A. Sycamore, NPS

L. Childers, USFWS
bcc: ERD Off File w/encis & Background

ERD Rdg File

RB Rdg File CCC Rdg File ED Goller, ERD w/encls File Code: 40.42.5.6

BL Foley, ERD w/encis

MGR Rda File

P.F.X. Dunigan, Jr., EAP w/encls

RECEIVED

Record Note: Forwards CX For N Springs Expedited Response Action, 100-N Area, Hanford Site, Richland, Washington

JUL 0 6 1993

BRYAN.F\NEPABORG.LTR

DOE - RL/CCC

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OFFICE >	EAP XMY	EAP	EAP	осс	DEP	MGR
SURNAME>	THOMPSON '	CLARKE	RASMUSSEN	CAROSINO	HAMRIC	WAGONER
DATE >	5/28/93					

7543322.0136

CATEGORICAL EXCLUSION FOR EXPEDITED RESPONSE ACTION FOR THE N SPRINGS, 100-N AREA, HANFORD SITE, RICHLAND, WASHINGTON

Proposed Action

The U.S. Department of Energy (DOE), Richland Operations Office (RL) proposes to perform an expedited response action at the N Springs.

Location of Action

Between the 1301-N and 1325-N Cribs and the Columbia River, 100-N Area, Hanford Site, Richland, Washington

Description of Proposed Action

The proposed action would be to conduct a non-time critical removal action under Comprehensive Environmental Response, Compensation, and Liability (CERCLA) Act of 1980 regulatory authority. This removal would reduce existing transport of strontium (Sr)-90 to the Columbia River. A vertical slurry wall would be placed about 200 feet from the river, upon a small plateau about 64 vertical feet above the river. The wall would be about 2800 feet long, 5 feet wide, and about 104 feet deep.

The slurry wall would be designed to restrict the flux of Sr-90 by creating a zone of stagnation in the groundwater immediately behind the wall. Because the Sr-90 would adsorb to soil particles, it is expected that the slurry wall will restrict the flux of Sr-90 to the river for at least 30 years.

The site was surveyed for the presence of cultural resources. No cultural materials were identified at the site and a clearance was issued (HCRC# 92-100-032). The proposed slurry wall site has been extensively disturbed in the past, and the placement of the wall is not expected to cause significant adverse ecological impact. The top of the slurry wall would be revegetated after completion.

The estimated cost of this action is about \$9.75 million. This removal action would not meet the CERCLA time and cost limitations defined in the National Contingency Plan, but it appears to satisfy the exemptions to those limits identified in the DOE Memorandum from EH-25, dated March 19, 1991, titled "Use of the NEPA Categorical Exclusion for Removal-type Actions."

Categorical Exclusion (CX) to be applied

The following CX is listed in the DOE National Environmental Policy Act (NEPA) Implementing Procedures, 10 Code of Federal Regulations (CFR) 1021, Subpart D, which was published in the Friday, April 24, 1992, 57 Federal Register 15151):

"Removal actions under CERCLA (including those taken as final response B6.1 actions and those taken before remedial action) and removal-type actions similar in scope under RCRA and other authorities (including those taken as partial closure actions and those taken before corrective action), including treatment (e.g., incineration), recovery, storage, or disposal of wastes at existing facilities currently handling the type of waste involved in the removal action. These actions will meet the CERCLA regulatory cost and time limits or satisfy either of the two regulatory exemptions from those cost and time limits (National Contingency Plan, 40 CFR part 300)."

This CX is appropriate because the action would not have a significant effect on the human environment and meets the conditions for the CX: does not have extraordinary circumstances; is not connected to other actions with potentially significant impacts; is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211; does not threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, or health, including DOE orders; does not require siting, construction, or major expansion of waste storage, disposal, recovery, or treatment facilities; does not disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum or natural gas products that preexist in the environment causing uncontrolled or unpermitted releases; does not adversely impact environmentally sensitive resources such as historic properties, cultural resources, threatened or endangered species, and floodplains and wetlands; uses existing waste facilities currently handling the type of waste involved in the removal action; meets the qualifications for the exemption to the CERCLA regulatory cost and time limits. Documentation for the project indicating satisfaction of the conditions of this CX will be retained by RL.

I have reviewed the documentation and do not object to the use of this CX.

Signature:

RL NEPA Compliance Officer

Hanford Reach Review:

I have reviewed the proposed action as required under Section 2.(a.)(4) of the Hanford Reach Act (P.L. 100-605). I have determined that the proposed action will not have "a direct and adverse effect on the values for which the river segment is under study."

Signature:

Robert J. Karopko, Untef of Recreational Programs National Park Service

Pacific Northwest Regional Office

9513322.0138

Compliance Action:

I have determined that the proposed actions meet the requirements for the CX referenced above. Therefore, I have determined, using the authority delegated to me by the Assistant Secretary of Environmental Restoration and Waste Management, that the proposed action may be categorically excluded from further NEPA review and documentation.

Signature: John D. Wagoner, Manager Richland Operations Office	7-5-93 Date
EH-25 has reviewed this determination* and has no	objection.
Signature: Carol M. Borgstrom, Director Office of NEPA Oversight, EH-25	Date

INFORMATION BULLETIN

PROPOSED ACTION:

EXPEDITED RESPONSE ACTION FOR THE N SPRINGS, 100-N AREA,

HANFORD SITE, RICHLAND, WASHINGTON

DESCRIPTION OF PROPOSED ACTION

The proposed action would be to perform a Comprehensive Environmental Response, Compensation, and Liability (CERCLA) Act of 1980 expedited response action (ERA) at N Springs in the 100-N Area, to restrict strontium (Sr)-90 transport to the Columbia River through the groundwater pathway.

Background

The N Reactor was operated as a dual production reactor (plutonium and by-product steam for electricity generation) from 1963 until 1987. Since 1987, the reactor has been taken through progressive stages of shutdown and will eventually be decommissioned. Low-level radioactive liquid effluents from reactor operations were disposed to the 1301-N and 1325-N Cribs and Trenches (116-N-1 and 116-N-3) during the life of the reactor.

The 1301-N Crib received effluents from the reactor coolant system, fuel storage basin, periphery coolant systems, and other radioactive drain systems from 1964 to 1985. The average flow rate is estimated at 2,087 gallons (7,900 liters)/minute. The 1325-N Crib was constructed in 1983 to replace the 1301-N Crib. The 1325-N Crib began receiving N Reactor flow in 1983, and was put into full service in 1985, so it received effluent for only a few years (1983 to 1987). Average flows to 1325-N during full operation are estimated to have been about 450 gallons (1,700 liters)/minute. Liquid effluent discharges to the soil have essentially ceased as shutdown and decontamination operations at the reactor have progressed. The 1301-N and 1325-N Cribs are dangerous waste disposal facilities under Resource, Conservation and Recovery (RCRA) Act of 1976 interim status. Closure and post-closure plans are scheduled for submittal in May 1994 to fulfill the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Milestone M-20-31.

For-a time, the soil column underlying the cribs provided adsorption capacity for contaminants. However, this adsorption capacity is saturated for some contaminants, and certain radionuclides are entering the Columbia River. The area along the southern riverbank where the contaminated groundwater discharges to the river is known as N Springs. Sampling of N Springs occurred from 1988 to 1992, and showed that the principal radionuclide of concern, Sr-90, is present at an average concentration of 6,500 picoCuries/L, with maximum sample concentrations as high as 11,000 picoCuries/L (data from 1991 sampling efforts). Tritium is also present at significantly elevated levels. The rate of radionuclide release to the river is slowly diminishing because of lower groundwater flows as a result of the N Reactor shutdown and radioactive decay. Although Sr-90 has a relatively short half-life (29 years), N Springs will continue to be the primary source of radionuclides to the river for many years.

9352590 Enclosure I Page 2 of II

Liquid effluents discharged to the two cribs created a groundwater mound in the area, altering normal groundwater flow patterns. In addition, the level of the Columbia River significantly influences the groundwater in the 100-N Area. The level in the river varies due to regulation of releases from the Priest Rapids Dam about 17 miles upstream of 100-N. The effect of the fluctuations in the river can be detected in groundwater wells more than 750 feet from the river for daily fluctuations and more that 1000 feet for seasonal fluctuations. This riverine influence essentially serves to periodically flush contaminants disposed to the cribs into the river.

Proposed Action

Since the N Springs represent a pathway for contaminant releases to the river, it is proposed that the U.S. Department of Energy (DOE) conduct a non-time critical removal action under CERCLA regulatory authority. This removal would not constitute final remedial action for the site, but would reduce existing contaminant transport to the Columbia River.

The proposed action would be to construct a vertical barrier between the cribs and the Columbia River, in the form of a slurry wall. The original site for the slurry wall was close to the Columbia River, in order to trap most of the Sr-90 flux. However, it was determined that this site might cause adverse environmental impacts to natural resources within the 100-year floodplain and adjacent wetlands. The slurry wall would likely be placed about 200 feet from the river, upon a small plateau about 64 vertical feet above the river. The wall would be about 2800 feet long, spanning the entire width of the Sr-90 plume where it intersects the river (Figure 1).

The slurry wall would be designed to restrict the flux of Sr-90 by creating a zone of stagnation in the groundwater immediately behind the wall. The groundwater (and tritium) would continue to reach the river, by eventually diverting around the wall. However, the flux of Sr-90 is significantly slower than ambient groundwater flow, because the Sr-90 adsorbs to the soil column. It is expected that the slurry wall (combined with the relatively short half-life-of Sr-90) would restrict the flux of Sr-90 for at least 30 years, effectively preventing the isotope from entering the Columbia River. Results from PORFLO-3 modelling indicate that the slurry wall would effectively reduce the annual Sr-90 flux to very low levels (0.001 Ci/yr in the year 2002 as compared to 0.67 Ci in the same year with no wall).

The cement-like slurry wall would be keyed into the confining layer underlying the unconfined aquifer, preventing the migration of contaminants under the wall (Figure 2). Slurry materials could include soil-bentonite and cement-bentonite mixes. An augering construction technique is proposed to construct the slurry wall. The wall would be completed by augering and mixing a series of overlapping holes, creating a wall approximately 5 feet thick and about 104 feet deep. This method would require the disposal of a very limited amount of contaminated soil, as almost all of the soil would be left in place

9352590 Enclosure 1 Page 3 of 11

and/or mixed into the slurry. Contaminated soil is expected to be radioactive waste only.

The slurry mixture would be placed in the lower half of the augered holes. The soil in the upper half of each hole would remain in place as the auger cuts through it. The top of the wall would be at ground level, and, after completion of the wall, the top surface would be revegetated with species compatible with the site. Therefore, after the slurry wall is in place there would be essentially no visual impacts from the Columbia River or the 100-N Area.

Appropriate federal, state, and DOE guidelines and requirements would be followed to complete the ERA. A DOE-Contractor excavation permit, hazardous waste operations permit, and a radiation work permit would be obtained for the activity. Equipment decontamination would occur on-site in accordance with approved procedures. No new construction would occur except for the possible placement of fences, temporary support facilities and field shelters. Federal, state, or local permits are not required under Section 121(e) of CERCLA for on-site actions conducted pursuant to CERCLA. However, DOE would ensure that the actions conform with substantive requirements of pertinent regulations. To the extent practicable, the proposed action would attain applicable or relevant and appropriate requirements (ARARs). The ARARs for the proposed action have not been identified, but will include chemical-specific, location-specific, and action-specific requirements.

Potential environmental impacts associated with the ERA will also be addressed in the Hanford Remedial Action Environmental Impact Statement (HRA-EIS), expected to be finalized in 1995. This EIS will address potential cumulative and incremental environmental impacts of a number of Hanford Site environmental restoration activities, including remediation of the 100-N Area. However, the HRA-EIS will not address specific proposed cleanup actions at each site. This ERA would not prejudice the selection of alternatives presented in the HRA-EIS, and would be consistent with final remediation goals for the Hanford Site.

It is estimated that the cost of this ERA would be approximately \$9.75 million over the life of the project (slurry wall maintenance is expected to continue for ten years). This removal action would not meet the CERCLA time and cost limitations defined in the National Contingency Plan, but it appears to satisfy the exemptions to those limits identified in the DOE Memorandum from EH-25, dated March 19, 1991, titled "Use of the NEPA Categorical Exclusion for Removal-type Actions."

As defined in the Memorandum, the proposed action appears to be exempted from the identified time and cost limitations because the action would be "otherwise appropriate and consistent with the remedial action to be taken." The action fits the "otherwise appropriate" definition because the goal would be to prevent the further migration of contaminants. The proposed action is "consistent with the remedial action to be taken" because the slurry wall

9352590 Enclosure 1 Page 4 of 11

would not preclude any of the feasible remedial action alternatives in the HRA-EIS. The underlying goal of this ERA is the temporary elimination or reduction of Sr-90 to the Columbia River. Final remediation of the area would only occur after analysis in the HRA-EIS or other appropriate National Environmental Policy Act (NEPA) review tiered from the HRA-EIS.

IMPACT

The following checklist summarizes environmental impacts that were considered for the proposed action. All "YES" answers are explained in detail in the text following the checklist.

IMPACT TO THE AIR

	Would the proposed action:	YES	МО
1	Result in gaseous discharges to the environment?	х	
2	Release carticulates or drops to the atmosphere?	х	
3	Result in thermal discharges to the environment?	х	
4	Violate federal, state, or local emission standards?		х
5	Cause any other atmospheric disturbance?		Х
6	Violate ambient air quality standards (e.g., CO, NO,)?		х
7	Increase offsite radiation dose to >0.1 mrem (40 CFR 61 Subpart #)?		X

IMPACT TO WATER

	Would the proposed action:	YES	NO
8	Discharge any liquids to the environment?		х
9	Discharge heat to surface or subsurface water?		x
10	Alter stream flow cates?		Х
11	Significantly alter natural evacoration rates?		x
12	Release soluble solids to natural waters?		x
13	Provide Interconnection between adulters?		х
14	Require installation of wells?	х	
15	Require a Spill Control and Prevention Plan?		Υ
16	Violate water quality standards (CCD, 3CD, pH etc.)?		х

9352590 Enclosure 1 Page 5 of 11

IMPACT TO LAND

	Would the proposed action:	YES	ОК
17	Conflict with existing zoning or land use?		x
18_	Be located on wetlands?		х
19	Be located on the 100-year floodplain?		X
20	Generate nonhazardous solid waste?	х	
21	Create hazardous, radioactive, PC3, or asbestos waste?	х	
22	Cause erosion?		х
23	Impact prime or unique farmtand?		х
24	Be located on the Arid Land Ecology Reserve?		x
25	Require an excavation permit?	. х	
26	Disturb an undeveloped area?		х

GENERAL

	Would the proposed action:	YES	ЖО
27	Increase noise level?	х	
28	Adversely impact sensitive species or critical habitat?		x
29 ·	Be within the Hanford Reach Study Area?	х	
30	Make a long-term commitment of nonrenewable resources?	х	
31	Require new utilities or modifications to utilities?	<u> </u>	, x
32	Use pesticides, carcinogens, or toxic chemicals?	<u> </u>	х
33	Require a radiation work permit?	х	,
34	Adversely affect archaeological or historical property?		х

Gaseous discharges would be limited to minor amounts of equipment exhaust emissions from vehicles and motors used during this proposed action.

Particulate releases to the atmosphere would be limited to fugitive dust that might occur as a result of the proposed activities (i.e., excavation, movement of vehicles and equipment). Because the Columbia River is located within 200 feet of the proposed slurry wall, all appropriate care would be taken to minimize the chance of the river becoming a pathway for particulates. The deep soil mixing technique was chosen in part because it results in significantly less release of particulates to the environment and would result in negligible amounts of contaminated drill cuttings. Droplet releases might result from the use of uncontaminated water, which would be applied as necessary to mitigate dust during excavation activities.

Minor amounts of heat would be generated by the vehicles used to perform the activities.

Long-term impacts would include the alteration of local hydrology. However, this is a necessary goal of the action, considering the extent of current contamination of the groundwater. The quality of surface water would be improved over time, as the flow of Sr-90 to the river is restricted.

The U.S. Environmental Protection Agency (EPA) issued a National Discharge Elimination System Permit for the 1301-N Facility. The permit requires routine monitoring of discharges to the Columbia River from the N Springs. The proposed action would restrict the flow of Sr-90 to the river, and is not expected to introduce any other contaminants to the N Springs flow. The EPA would be given the opportunity to review the proposed action and to provide comments, but it is not expected that the permit would require modification before placement of the slurry wall.

The proposed action would result in a slightly larger area of contamination. After placement of the slurry wall, it is expected that most of the Sr-90 would adsorb to soil particles within the existing zone of contamination behind the wall. The proposed slurry wall is not expected to substantially increase the scope of future remediation.

Placement of the slurry wall would be about 200 feet from the Columbia River. The wall would be located on a small, previously disturbed plateau above a wide grassy shelf of land that includes the river and the 100-year floodplain. None of the activities associated with the slurry wall placement would occur within wetlands, critical habitats, or other sensitive areas.

The proposed action may require that additional groundwater monitoring wells be installed to accurately assess the performance of the slurry wall. Well installation would be evaluated as the project progresses.

Removal, storage, and disposal of the waste would be in accordance with applicable federal and state regulations and guidelines and would not impact employees or the environment. If contaminated soil must be disposed of, it would be packaged appropriately and placed in the Low-Level Burial Grounds, or other appropriate waste disposal unit. The removed material would not be so extensive as to warrant construction or expansion of waste disposal, recovery, or treatment facilities.

Noise levels would be increased temporarily for short periods in the immediate vicinity as a result of the proposed activities (e.g., motors, excavation). In addition, the ongoing slurry wall monitoring and maintenance activities would produce negligible noise. After wall placement, noise would not be discernable from the bank of the Columbia River, and would not affect the public.

Biological surveys of the 100 Areas were performed in support of CERCLA characterization efforts in 1991 and 1992 (Biological Assessment for Rare and Endangered Plant Species, 1992; and draft Biological Assessment for Threatened and Endangered Wildlife Species, 1992). These surveys did not identify any sensitive species in the vicinity of the proposed slurry wall.

The proposed slurry wall site has been extensively disturbed in the past. Most of the site is exposed dirt and rock; the limited vegetation present is

dominated by introduced weed species such as Russian thistle and cheat grass. The proposed action would not cause a consequential impact to ecological resources in the vicinity.

The proposed action would occur within 1/4 mile of the Columbia River. In accordance with Public Law 100-605, Hanford Reach Study Act, the National Park Service (NPS) of the U.S. Department of the Interior would be requested to review the project for any direct and adverse effects on the resources for which the river is under study and to help identify measures to mitigate any such impacts.

Small amounts of nonrenewable resources (such as petroleum products) would be consumed by the activity. However, consumption of these resources would occur on a short-term basis and would cease when construction of the slurry wall is completed. The slurry wall itself would represent the commitment of resources.

A radiation work permit would be required to implement the proposed action, because construction of the slurry wall could potentially expose workers to radiation above background levels. Worker safety would be monitored and maintained in accordance with existing DOE and DOE Contractor procedures, including As Low As Reasonably Achievable (ALARA) procedures.

A cultural resources review of the proposed slurry wall site was performed by the Hanford Cultural Resources Laboratory (HCRC# 92-100-032). The clearance states that no cultural properties are known to be located at the site. Monitoring of the excavation by an archaeologist is not required, though workers would be directed to watch for cultural materials during excavation. If materials were encountered, work in the vicinity of the discovery would stop until an archaeologist had assessed the significance of the find and arranged for mitigation of impacts. If additional groundwater monitoring wells are required, the need for another cultural resources review would be evaluated.

NEPA REVIEW

The Westinghouse Hanford Company NEPA Documentation Function reviewed the proposed action and believes that this action is covered under a Categorical Exclusion (CX) in Subpart D of the DOE NEPA Implementing Procedures (10 Code of Federal Regulations [CFR] 1021). The CX is included below for DOE review and determination:

"Removal actions under CERCLA (including those taken as final response actions and those taken before remedial action) and removal-type actions similar in scope under RCRA and other authorities (including those taken as partial closure actions and those taken before corrective action), including treatment (e.g., incineration), recovery, storage, or disposal of wastes at existing facilities currently handling the type of waste involved in the removal action. These actions will meet the CERCLA regulatory cost and time limits or satisfy either of the two regulatory exemptions from those cost and

time limits (National Contingency Plan, 40 CFR part 300). These actions include, but are not limited to:

(g) Confinement or perimeter protection using dikes, trenches, ditches, or diversions if needed to reduce the spread of, or direct contact with, the contamination;"

ELIGIBILITY CRITERIA

The proposed removal activity meets the eligibility criteria of 10 CFR 1021.410(b) since there are no extraordinary circumstances that may affect the significance of the environmental effects of the proposal. Further, the proposed activity would not prejudice the selection of alternatives in the HRA-EIS and is not precluded by 10 CFR 1021.211.

The "Integral Elements" of 10 CFR 1021 are satisfied as discussed below:

INTEGRAL ELEMENTS 10 CFR 1021, SUBPART D, APPENDIX B				
Would the Proposed Action:	Comment or explanation:			
Threaten a violation of environmental, safety or health laws, regulations, or DOE orders?	The expedited response activity would not violate environmental laws, regulations, or DOE orders.			
Require siting, construction or major expansion of waste treatment, storage, or disposal facilities?	The proposed activity would not create excessive amounts of waste. Waste would be disposed of or stored in accordance with applicable regulations.			
Disturb hazardous substances preexisting in the environment, allowing uncontrolled releases?	The proposed activity would occur in contaminated areas, however, there would be no uncontrolled or unpermitted releases of hazardous substances. Activities would be performed in accordance with applicable environmental and safety regulations.			
Adversely affect archeological or historical property?	An appropriate clearance (#92-100-032) was obtained for the proposed action. Please refer to the Impacts Section.			
Adversely affect federally- or state listed, proposed or candidate, threatened or endangered species or habitat?	The vegetation of the site has been extensively disturbed in the past. Please refer to the Impacts Section.			
AdVersely affect floodplains or wetlands?	While the slurry wall site is located <u>near</u> the 100-year floodplain of the Columbia River, the proposed site would not adversely impact the floodplain or wetlands.			
Adversely affect wild and scenic rivers, state or federal wildlife refuges, or specially designated areas?	The proposed activity would be located within the Hanford Reach Study Area, and the NPS would be provided an opportunity to review and comment on the proposed action.			
Affect special sources of water?	The proposed activity would not affect special sources of water. This action would improve the water quality of the Columbia River.			

9352590 Enclosure 1 Page 9 of 11

The proposed action fulfills the conditions of CX B6.1, as the activity would be a removal action under CERCLA. The ERA would use existing waste facilities currently handling the type of waste involved in this proposed action. The action would not meet the CERCLA regulatory cost and time limits found in the National Contingency Plan, however, it appears to meet the exemptions to those limitations. A cultural resources review was performed in support of the action.

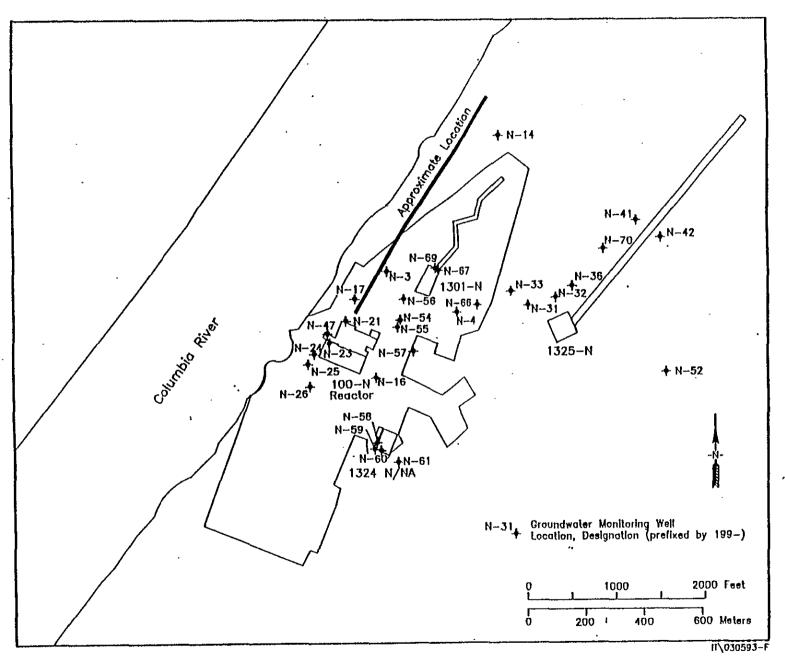


Figure 1. Proposed Location of the Slurry Wall in the 100-N Area

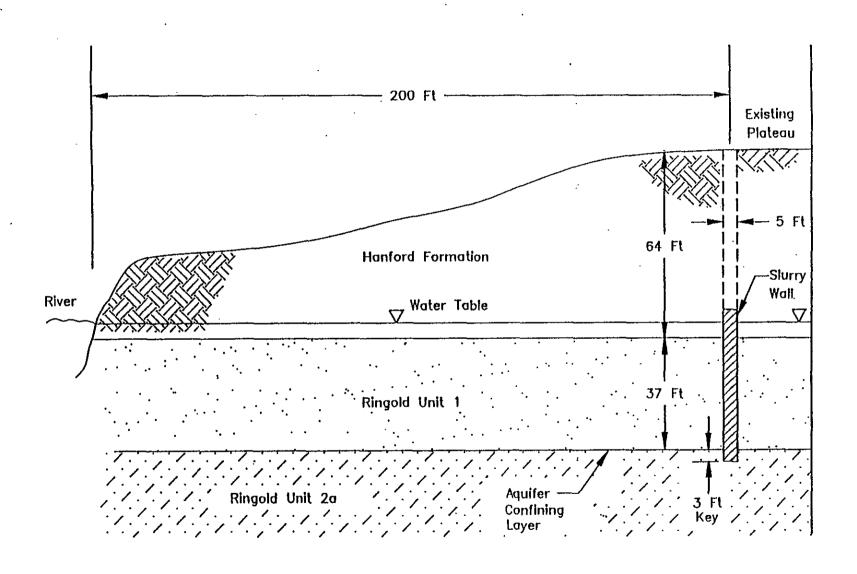


Figure 2. Side View of the Slurry Wall

CORRESPONDENCE DISTRIBUTION COVERSHEET

Author

Addressee

Correspondence No.

J. D. Wagoner, RL (R. S. Weeks, WHC) C. M. Borgstrom, DOE-HQ

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XREF:9352590 27145

subject: NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) CATEGORICAL EXCLUSION (CX) DETERMINATION: EXPEDITED RESPONSE ACTION (ERA) FOR THE N-SPRINGS, 100-N AREA, HANFORD SITE, RICHLAND, WASHINGTON

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